

# **EXHIBIT B**



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August 25, 2020

***Via Electronic Mail***

Layne Hilton  
Kanner & Whiteley, L.L.C.  
701 Camp Street  
New Orleans, LA 70130

***Re: In re Valsartan, Losartan and Irbesartan  
Civil Action No. 19-md-2875-RBK-JS***

Dear Counsel:

We represent Defendants Hetero Drugs Ltd. and Hetero Labs Ltd. ("HLL") in the above referenced matter. HLL writes in response to Plaintiffs' letter dated August 17, 2020, setting forth alleged deficiencies in HLL's document productions.

As an initial matter, Plaintiffs requested that HLL provide a privilege log regarding redacted documents or those withheld on the basis of privilege. HLL submits that it has thus far not produced redacted documents, nor withheld documents on the basis of privilege. As such, HLL states that it is not required to provide a privilege log at this time.

Second, Plaintiffs contend that Defendants' Production Indexes fail to conform to the ESI Protocol in this litigation. While HLL disagrees with Plaintiffs' position that HLL's Production Indexes were deficient, HLL is aware that our co-defendant ZHP has come to an agreement with Plaintiffs' Counsel Behram Parekh regarding the scope of information to be contained in the "Sources" column. Consistent with that agreement, HLL will provide additional information in the "Sources" column, which will accompany HLL's Third ESI Production on or about 9/15/20.

Finally, Plaintiffs assert that HLL has failed to adhere to the prioritization of discovery list that Plaintiffs have previously provided to Defendants. HLL states that it is making every effort to comply with Plaintiffs' proposed prioritization. Moreover, HLL will continue to diligently produce documents which Plaintiffs have prioritized.

If you have any questions or concerns, please do not hesitate to contact me. Thank you for your time and attention in this matter.

Sincerely,

s/ Eric I. Abraham  
ERIC I. ABRAHAM

HILL WALLACK LLP  
ATTORNEYS AT LAW

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cc: Adam Slater, Esq. (via email)  
Valsartan PEC List-Serve (via email)  
Counsel for Defendants Teva, Mylan, Aurobindo, Torrent, ZHP (via email)